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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA,

CASE NO.: 1:19-CR-00240

Plaintiff,

JUDGE DAN A. POLSTER

~ VS ~

CHRISTOPHER HARDIN,

Defendant.

MOTION TO EXTEND BUREAU OF PRISONS NOVEMBER 1, 2019 SELF-SURRENDER DATE TO DECEMBER 1, 2019

NOW COMES the Defendant, Christopher Hardin, by and through his undersigned counsel, and hereby respectfully requests this Honorable Court issue an Order continuing Defendant's November 1, 2019 Bureau of Prisons self-surrender date to December 1, 2019, for the following reasons:

On September 20, 2019, Defendant Christopher Hardin motioned the Court for an Order continuing the October 15, 2019 self-surrender date to November 1, 2019, as originally Ordered by the Court at the time of Defendant's Sentencing, to allow Defendant additional time to complete all work-ordered projects prior to his commitment to prison. (Doc. 15). On September 23, 2019, the Court granted Defendant's Motion, allowing Defendant to self-surrender to the Bureau of Prisons on or before November 1, 2019, at 12:00 p.m. (Doc. 16).

Defendant is respectfully requesting a second and final extension of his Bureau of Prisons self-surrender date to December 1, 2019 to complete the remaining five work projects Defendant has under contract. Defendant will be unable to complete all work prior to the November 1, 2019 date, and is requesting an additional four weeks to finalize all work. If this relief is granted, Defendant will make a payment towards the Court

Ordered restitution and surrender himself to FCI Elkton. Defendant has made arrangements for his business to function in his absence, however, the best interests of the victims in receiving the greater part of restitution more quickly would be served by one additional 30 day extension of the BOP surrender date. Job estimates of each of the remaining projects are attached hereto as Exhibits 1 through 5.

WHEREFORE, Defendant respectfully requests this Honorable Court issue an Order, extending his November 1, 2019 self-surrender date to December 1, 2019, to allow Defendant the additional time necessary to complete all work projects remaining open and under contract. Defendant will make no further motions requesting an extension of his self-surrender date.

Respectfully submitted,

/s/ - Michael J. Goldberg

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CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of October 2019, a copy of the foregoing has been filed electronically and served upon all parties of record by operation of the Court's electronic filing system and/or regular U.S. mail, postage paid and/or email. Parties may access this filing through the Court's system.

/s/ - Michael J. Goldberg
MICHAEL J. GOLDBERG, ESQ.